

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Bobbi Ann Creegan

Debtor

Mortgage Research Center LLC d/b/a  
Veterans United Home Loans, a  
Missouri Limited Liability  
Corporation  
Movant

Case No. 1-23-bk-01112-HWV

Chapter 13

Vs.

Bobbi Ann Creegan  
Debtor

Jack N. Zaharopoulos  
Trustee

**ANSWER TO MOTION FOR RELIEF FROM STAY**

AND NOW, this 11<sup>th</sup> day of December 2023, comes the Debtor, Bobbi Ann Creegan, by and through her counsel, the CGA Law Firm and answers the Motion for Relief from Automatic Stay of Movant, Mortgage Research Center LLC as follows:

1. Admitted.
2. Admitted with qualification. Nicholas Creegan is not a debtor in this bankruptcy case.
3. Admitted.
4. Denied. Paragraph 4 refers to a writing which only contains legal conclusions which no response is required of the Federal Rules of Bankruptcy Procedure. Any characterization is denied. Strict proof of enforceability of the mortgage instrument is demanded.
5. Admitted.

6. Denied. Mr. Creegan is not a debtor in this case. Further, his alleged obligations to Movant are not relevant to the determination of whether Movant has cause to lift the Automatic Stay.

7. Admitted.

8. Denied. The Debtor is without knowledge concerning the total reinstatement amount. Strict proof of all indebtedness is demanded.

9. Denied. The Debtor is without knowledge concerning the total reinstatement amount. Strict proof of all indebtedness is demanded.

10. Denied. Paragraph 10 alleges legal conclusion for which no response required under the Federal rules of bankruptcy procedure. To the extent that such response is required, debtor is able to fund any alleged post-petition arrears inside a modify chapter 13 plan. Further, the Debtor believes that Movant is adequately protected by an equity cushion that exists as to Movant's interest in relation to the value of the Property.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,

CGA Law Firm, PC

/s/ Brent C. Diefenderfer  
Brent C. Diefenderfer, Esquire  
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135 North George Street  
York, PA 17401  
(717) 848-4900  
Counsel for Debtor

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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2023, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Jack N. Zaharopoulos , Chapter 13 Trustee  
ECF

Michael P. Farrington,  
Esquire  
KML Law Group, P.C.  
701 Market Street, Suite  
5000  
Philadelphia, PA 19106

/s/ Brent C. Diefenderfer  
Brent C. Diefenderfer, Esquire